

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

2005 SEP 28 A 9:36

DEBRA P. HACKETT, CLERK
U.S. DISTRICT COURT
MIDDLE DISTRICT ALA.

MARSHALL TAYLOR,)
)
Plaintiff,)
)
v.)
)
CHIEF ALFORD WADSWORTH)
and CHARLOTTE REED,)
)
Defendants.)

2:05-cv-00745-A

MARSHALL TAYLOR,)
)
Plaintiff,)
)
v.)
)
CHIEF ALFORD WADSWORTH)
Defendant.)

2:05-cv-800-T

MOTION TO CONSOLIDATE

COME NOW Defendants Chief Alfred Wadsworth and Charlotte Reed, by and through counsel, and move this Honorable Court to order the consolidation of the above two actions for purposes of discovery and trial and as grounds therefor state the following:

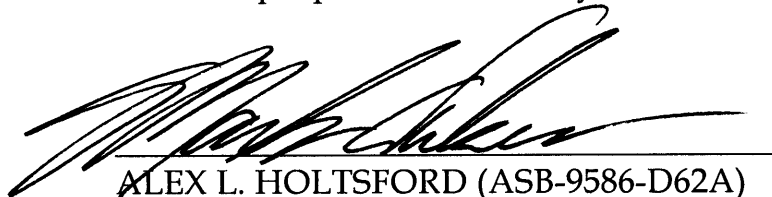
1. The above-styled cases concerning the Plaintiff's alleged violation of his constitutional rights by evil spirits and Prattville police officers at the direction of

Defendants Wadsworth and Reed, involve common questions of law and fact.

2. From aught that appears, the alleged incident made the basis of the Plaintiff's complaint in civil action number 2:05-cv-745-A is the same incident alleged in the Plaintiff's amendment to civil action number 2:05-cv-800-T.

3. Consolidation of the instant cases would facilitate and expedite discovery, decrease the cost to these Defendants of discovery and defense of two cases, and would enhance judicial economy. Further, consolidation of these two actions would not unfairly prejudice the Plaintiff.

WHEREFORE, on the grounds set forth above, pursuant to Rules 16, 26, and 42 of the *Federal Rules of Civil Procedure*, these Defendants pray this Honorable Court order the above-styled causes consolidated for purposes of discovery and trial.



ALEX L. HOLTSFORD (ASB-9586-D62A)
S. MARK DUKES (ASB-9697-U77S)
Counsel for Defendants Alfred Wadsworth
and Charlotte Reed

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CERTIFICATE OF SERVICE

I hereby certify that I have this day mailed, postage prepaid, an exact copy of the foregoing document to

Mr. Marshall Taylor
229 Lewis Street
Prattville, AL 36067

on this the 27th day of September 2005.


OF COUNSEL